

LOCATION OF CORRECTIONS IN THE 2019 ANP TO EPA'S FINDINGS REGARDING THE 2018 SDAPCD'S ANP

1. ANP SUBMITTAL TIME

EPA FINDING

1.	Submit plan by July 1 st	58.10 (a)(1)	Yes, email & ANP cover	No	Plan was submitted on July 10
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SDAPCD REPLY

Location in 2019 ANP: Cover page

Noted (and corrected for the 2019 ANP).

No programmatic changes necessary.

We cannot guarantee that this will not happen again for reasons that can be elaborated upon at the next TSA.

2. SEVERAL RELOCATIONS

EPA FINDING

4.	Modifications to SLAMS network – case when we are not approving system modifications	58.10 (a)(2); 58.10 (b)(5); 58.10 (e); 58.14	Yes, chapter 1	Insufficient to judge	Several relocations are discussed in the plan for 2019. Please work with EPA to formally approve all relocations and shutdowns. EPA Region 9 will not be approving the discontinuation of Pb monitoring at Palomar Airport, but will continue to work with OAQPS to determine discontinuation eligibility.
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SDAPCD REPLY

Location in 2019 ANP: Section 1.4.1 Station Changes (Relocations, Shutdowns, and Additions)

No programmatic corrections necessary.

We believe this is a simple misunderstanding due to the verbiage used in prior ANPs by using suggested timelines. To avoid this as a finding for future ANPs, we will eliminate timelines for the station moves for which we have no defined solution and require EPA approval. The narrative we will provide will serve to solely keep EPA informed that we are actively working towards solutions for these moves, but until these moves become defined (Monitoring workload dependent for reasons that can be elaborated upon at the next TSA), no official paperwork will be filed with EPA (also, stated in Section 1.4.1). Please see below for some additional information and questions:

- a. There are the same possible relocations in the 2019 ANP as there were in the 2018 ANP. As stated in both ANPs, the District has worked with EPA for all changes (and have since 2009) and will continue to work with EPA regarding all changes (planned or unplanned) in the future. Not including the ones listed in the 2019 ANP, the Ambient Air Quality Network Section has had 30+ station demolitions, start-ups, and relocations in 10 years and we've kept EPA informed on all of them and filed the requisite paperwork.
- b. Any news from OAQPS regarding approval for the 2017 District's request to deploy the PAMS ceilometer to a non-PAMS site in Escondido?

Note: this is the location we will be requesting to re-classify as our NCore site in the future. Too many spinning plates right now to address this NCore eventuality now.

- c. Any news from OAQPS regarding approval for the 2017 District's request to decommissioning Regulatory lead sampling at McClellan-Palomar Airport?

Note: the District will continue to sample for lead (and other metals), as part of the Toxics-Metals program.

3. **UNAPPROVED SHUTDOWNS**

EPA FINDING

7.	Any proposals to remove or move a monitoring station within a period of 18 months following plan submittal	58.10 (b)(5)	Y, chapter 1	Y	Please work with EPA on any upcoming and unapproved shutdowns and relocations.
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SDAPCD REPLY

Location in 2019 ANP: Section 1.4.1 Station Changes (Relocations, Shutdowns, and Additions) and affected Site Descriptions

No programmatic corrections necessary.

As with Finding #2, we believe this is a simple misunderstanding, due to the verbiage used in prior ANPs by using suggested timelines. To avoid this as a finding for future ANPs, we will eliminate timelines for the station moves for which we have no defined solution and require EPA approval. The information we will provide will serve to solely keep EPA informed that we are actively working towards solutions for these moves, but until these moves become defined (Monitoring workload dependent for reasons that can be elaborated upon at the next TSA), no official paperwork will be filed with EPA (also, stated in Section 1.4.1).

There were no unapproved shutdowns or relocations in 2018 and there are none in 2019 and none in 2020. As stated in Section 1.4.1 and the Site Description templates, we have kept and will continue to keep EPA R9 informed of every decision made regarding station moves, equipment changes, and equipment decommissioning.

4. **FLOW RATE AUDIT OUTSIDE OF 5-7 MONTH WINDOW**

EPA FINDING

28.	Dates of two semi-annual flow rate audits conducted in CY2018 for PM _{2.5} monitors [Note: 5-7 month interval is recommended but not a requirement.]	App. A 3.2.2	Yes, appendices 1-8	Yes	Flow rate audits at the Camp Pendleton monitor were performed on 9/5/18 and 12/22/18 which falls outside the recommended 5-7 month interval.
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SDAPCD REPLY

Location in 2019 ANP: None

Noted (and corrected). This instance is a typo. The Camp Pendleton monitor audit was performed on 2/22/2018 and not 12/22/2018 as stated in the ANP.

Programmatic change: The District will switch to quarterly flow rate audits for all PM equipment (PM_{2.5}, PM₁₀, and PM_{coarse} instruments)

We cannot guarantee that this will not happen again (for reasons that can be elaborated upon for our next TSA), although it should be a moot point now.

5. **RA40 MONITOR INOPERABLE**

EPA FINDING

49.	Minimum monitoring requirements for susceptible and vulnerable populations monitoring (aka RA40) NO ₂ (operation required by January 1, 2013)	App D 4.3.4	Yes, p. 53-54	Insufficient to judge	The RA40 monitor in San Diego is not operational. Please continue to work with EPA to determine if another San Diego monitor will be used for this requirement going forward.
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SDAPCD REPLY

Location in 2019 ANP: Section 3.2.3 Nitrogen Dioxide Minimum Monitoring Requirements-Regional Administrator

Noted (and “corrected”)

No changes necessary as the new station, Sherman Elementary School is fully operational and sampling. It is in the EJ community satisfying all the stakeholders in this site. The NO_x analyzer has been designated RA40 accordingly in the 2019 ANP. See below for elaboration.

The original site at Perkins Elementary School was in an EJ community. Due to eviction, the station had to be relocated to another EJ location (at the request of the residents and environmental action groups in that EJ community). As we had no other sites in this EJ location nor near this EJ location and given the District’s requirements to follow County construction protocols (it takes just as long to set-up a temporary sampling platform as a permanent one; see #6 below for construction timeline issues). Consequently, it was determined by EPA R9 (Michael Flag) and the District to wait until the new station in Sherman Heights became operational to designate the RA40 monitor.

6. **SECOND NEAR-ROAD SITE NOT OPERATIONAL**

EPA FINDING

51.	Two NO ₂ monitors	App. D 4.3.2(a); 58.13(c)(3) and (4)	Yes, p.49-52	No	Currently, the second near-road NO ₂ monitoring site is not operational. See Enclosure B for the approval of San Ysidro near road site.
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SDAPCD REPLY

Location in 2019 ANP: Section 3.2.1.2 Nitrogen Dioxide Minimum Monitoring Requirements -Near-road (second site)

Not corrected (but the site is under construction and should be operational by the time this report is officially reviewed).

Unfortunately, the site still is not constructed, but the demolition has just been completed (with electrical upgrades next and shelter construction last). To better understand the trials and tribulations associated with the San Diego County system, we’ve listed the stepwise progression for San Ysidro/2nd Near-road site (and other stations under EPA review) below:

The District is part of the San Diego County system, so two unassailable internal roadblocks and two unmovable external roadblock occurred (and will continue to occur for future such endeavors). Please see below:

1. Most relocations sites/areas require significant upgrades to the existing power grid. This requires going through the local electrical utility company first. This process takes months to years to move through the local utility bureaucracy (from CAPCOA calls, ours is not a unique problem, but is ours seems to take longer than others). Our County Department of Purchasing (DPC) will not proceed until we have a billable address for electrical power. This billable address the District gets from the local municipality. In every single instance, the local utility company demands an easement and we have to work with the local municipality to either get the easement or prove to the local utility company that it is not needed. This process takes months to years. Once we get an address, then and only then will the local utility company assign a work order. This work order gets put in their internal queue of jobs and slowly percolates up. Once it the work order is reviewed and approved, then and only then, will DPC take on the job. They will not review the paperwork beforehand (we've asked).
2. All procurements must go through DPC before it can proceed to the construction phase. DPC held up passing this job to the construction phase for about 8-10 months until they were sufficiently satisfied (5 different DPC purchasing agents from staff to supervisor to Middle Management to Executive Management were involved at each step and they each had concerns (usually the same ones and we would have to "re-invent the wheel" each time which delayed progress). Each needed to be certain that all the federal requirements regarding the competitive bidding process were satisfied. Once this was done, then and only then was the job given to the construction phase County department. This is how DPC operates and will continue to operate. We have no choice.
3. All construction activities must be undertaken by the County Department of General Services (DGS). DGS builds everything from bridges to installing electrical outlets. This means they have a long queue of tasks to be performed. DGS will not put a project in their queue until DPC has signed off on the process. When DGS gets the project from DPC, it goes to the bottom of the queue and slowly percolates its way up. This means any project gets further delayed.

This time delay is a significant issue and has been in a finding in prior TSAs. Unfortunately, we have zero influence for all the steps in this process, especially for the public utility (when we did tried to exert influence on the public utility for the site in Finding #5, it ended delaying the project by a year (we can't prove it, but they did not return our calls for almost a year).

Intervention by our Management with DPC and DGS respective Managements have not proven fruitful at all. We got the standard "your emergency is not our emergency" as a response from these departments. No intervention or assistance has proven beneficial at any step.

San Diego is notoriously bad in getting public-type works jobs done in a reasonable timeframe, even by government standards. Many public-works projects are moribund or in perpetual review phase. This has resulted in losing the San Diego Chargers to not building voter approved bridges to not expanding the Convention Center (with the threat of losing Comic-Con), etc. This is why:

- the Sherman Elementary School took so long to be built (Finding #5);
- the Escondido station has not completed construction (still being reviewed by the City of Escondido for over a year);
- the San Ysidro near-road site is now only at the construction phase after 4-years of verbal approval by EPA (Finding #6); and,
- the Chula Vista station has not been remodeled yet (and it is a safety concern).

7. **NEAR-ROAD PM_{2.5} NOT LISTED**

EPA FINDING

53.	One PM _{2.5} monitor	App. D 4.7.1(b)(2); 58.13(f)(2)	Yes, p. 84	No	EPA notes that SDAPCD was in the process of installing a PM _{2.5} FRM sampler at Rancho Carmel Drive in mid-2019. No site table was provided for this monitor in the plan.
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SDAPCD REPLY

Location in 2019 ANP: Appendix 7, PM-Table

Noted (and “corrected”)

No changes necessary as the new PM_{2.5} sampler has been deployed at the Rancho Carmel Drive near-road site and has been annotated accordingly in the 2019 ANP. See below for elaboration.

We believe this is a simple misunderstanding, due to unfamiliarity with our ANP terminology. The Executive Summary condenses all the official activities of 2019, but it also lists the in-the-process/under construction activities, as well as other activities. This in-the-process/under construction term is the source of confusion.

Anything in-the-process/under construction will not have any official information listed in the ANP (no Site Description Table filled out, no listing in the Pollutant chapters, no map location, etc.), for the simple reason, we are not operational; therefore, that site (or whatever) is not official. Once all DGS work is completed (DGS has stopped in the middle of a job before for various reasons and we have painfully learned to not list anything official until the work is signed off by DGS), all QA/QC start-up activities are completed, and sampling has commenced, no official information will be published.

This was the case for Rancho Carmel Drive. It was not operational in 2018, therefore there was no data to reference (nor Site Description table, etc.) in the 2018 ANP. It became operational in 2019. Now there is data to reference, including other required documentation in the 2019 (this) ANP.

8. SITE DESCRIPTION TEMPLATE MISSING INFORMATION

EPA FINDING

78.	Distance from supporting structure (vertical and horizontal, if applicable, should be provided)	App E 2	Y, appendices 1-8	Insufficient to judge in some instances	Distance is listed as "N" for the gaseous inlet at Rancho Carmel Dr. and Pb at Palomar
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SDAPCD REPLY

- a. *Location in 2019 ANP: Appendix 7, Rancho Carmel Drive - Distance the Equipment are from Influences*
Corrected

For Ranch Carmel Drive, there is no traditional supporting structure. It is a horizontal probe (placed in the direction of the prevailing wind flow) that goes directly from the analyzer and out the side of the building with a ledge-like support under the glass manifold. So, there no standard wood/metal deck; just the ground. In conversations with EPA, to correct this, we were instructed to state this description in the Site Description table for Rancho Carmel Drive to avoid future confusion.

Note: photos will be supplied in future ANPs, but due to COVID-19, they cannot be supplied at this time.

- b. *Location in 2019 ANP: Appendix 7, Palomar Airport - Distance the Equipment are from Influences*
Corrected

9. MISSING METHOD CODE FOR NEAR-ROAD EQUIPMENT (SECOND SITE)

EPA FINDING

5	Sampling and analysis method (method code)	40 CFR 58.10(b)(3)	Yes, Table 3-4	Incomplete	Method codes were not provided. In future ANPs this should be provided.
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SDAPCD REPLY

Location in 2019 ANP: Section 3.2.1.2 Nitrogen Dioxide Minimum Monitoring Requirements -Near-road (second site), Table 3-4
Corrected

We are pursuing different sampling parameters and equipment for this site, e.g. toxic metals analysis, or changing to true-NO₂, but as of now, the parameters listed in the 2019 ANP are the ones the District will use.

10. INACCURATE CENSUS VALUES

EPA FINDING

10	CBSA population & year	40 CFR 58, App. D 4.3.2(a)	Yes, Table 3-4	Yes	CBSA population was based on 2010 census. In future ANPs, please use latest census estimates.
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SDAPCD REPLY

Location in 2019 ANP: Throughout the document
No programmatic corrections necessary.

We believe it this is a simple misunderstanding as we state we are using population estimates from the San Diego Association of Governments (SANDAG). The official U.S. Census is only every 10 years, which is what the CFR states to use. The current official census for the 2018 and 2019 ANPs is the 2010 Census. The District uses population data from SANDAG to address yearly changes to the population of San Diego County. To ensure this is not a finding in the 2019 ANP and future ANPs, we state the following:

- a. In the Introduction chapter, we will state that the most recent official U.S. Census data is used and for non-Census years the District estimates current population using SANDAG estimates. Unless the Federal Government changes the law, this will always be 9 out of 10 years/ANPs.
- b. In each chapter (for each criteria pollutant), the most recent official U.S. Census data is used in the footnote and we write “estimated” for non-Census years.
Note: Since there are many requirements for each pollutant that are population based. We will only footnote “b” once (the first occurrence for needing the current population) in each chapter/pollutant; otherwise, it will make the document unnecessarily long for the same footnote.

11. MISSING REFERENCE YEAR FOR NEAR-ROAD AADT.

EPA FINDING

11	Maximum AADT counts & year for the CBSA(s)	40 CFR 58, App. D 4.3.2(a)	Yes, Table 3-4	Incomplete	Year was not provided. This should be provided in future ANPs. Since this is the second near-road site, maximum AADT is one of several considerations cited in the near-road TAD including: <i>higher population exposure (including vulnerable and susceptible populations)</i> which is the case with this San Ysidro site.
12	Current # of required near-road NO ₂ monitors for	40 CFR 58, App. D	Yes, Table 3-4	Yes	

SDAPCD REPLY

Location in 2019 ANP: Section 3.2.1.2 Nitrogen Dioxide Minimum Monitoring Requirements -Near-road (second site), Table 3-4

Corrected

Note: construction for this site is on track to be completed in late 2020, with an expected operational time of early 2021.